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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

AFFIDAVIT IN SUPPORT OF
ARREST WARRANT

- against -

CELENIA POLANCO, also known as
"Kathy,"

(T. 21, U.S.C., § 846)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SEAN GABAY, being duly sworn, deposes and says that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between January 1, 2011 and February 23, 2011, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CELENIA POLANCO, also known as "Kathy," together with others, did knowingly and intentionally conspire to possess with intent to distribute 500 grams or more of a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Section 846).

The source of your deponent's information and the

grounds for his belief are as follows:¹

1. I am informed of the following by two Cooperating Witnesses ("CW1" and "CW2"), whose information has proved reliable in the past and has been corroborated by independent evidence.

2. During the first week of February 2011, a co-conspirator ("Co-Conspirator 1") asked a woman ("Co-Conspirator 2") to travel to the Dominican Republic and return with a suitcase, in exchange for \$1,000. On or about February 17, 2011, Co-Conspirator 1 and Co-Conspirator 2 traveled together from the Bronx, New York to a passport office in New York, New York to renew Co-Conspirator 2's United States Passport. Co-Conspirator 2's passport application shows that Co-Conspirator 1 served as a witness, signed, and provided his driver's license as identification.

3. According to CW1 and CW2, Co-Conspirator 1 provided Co-Conspirator 2 with a round-trip airline ticket to the Dominican Republic. According to CW1, the defendant CELENIA POLANCO, also known as "Kathy," and Co-Conspirator 1 went together to Rivas Travel Agency, 2534 Marion Avenue, Bronx, New York to purchase the airline ticket for Co-Conspirator 2, and the

¹Because the purpose of this affidavit is only to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware. Information from CW1 and CW2 is set forth in substance and in part.

defendant paid for it. A records check at the travel agency reveals that "Kathy R." signed the itinerary for Co-Conspirator 2's trip. According to CW1 and CW2, the defendant's nickname is "Kathy." Further, the cellular telephone number listed on the travel reservation, according to CW1 and CW2, belongs to the defendant.

4. According to CW1 and CW2, on or about February 18, 2011, the defendant CELENIA POLANCO, also known as "Kathy," and Co-Conspirator 1 picked up Co-Conspirator 2 from her residence and drove her to John F. Kennedy International Airport in Queens, New York ("JFK"). The defendant and Co-Conspirator 1 provided Co-Conspirator 2 with a cellular phone, and instructed Co-Conspirator 2 to use it to call Co-Conspirator 1 upon her return to the United States. According to CW1 and CW2, this cellular telephone, whose number was listed on the itinerary for Co-Conspirator 2's trip, belongs to the defendant. That cellular telephone contains a number listed as "SUPA" which corresponds to the superintendent of the defendant's and Co-Conspirator 1's building.

5. On or about February 23, 2011, at approximately 9:10 a.m., Co-Conspirator 2 arrived at JFK aboard Jet Blue Flight 834 from Santiago, Dominican Republic, with a suitcase containing approximately 3517.9 grams of a white powdery substance that field-tested positive for cocaine. Co-Conspirator 2 was arrested

by federal agents upon arrival at the airport. According to CW1 and CW2, the suitcase and the cocaine in it were provided to Co-Conspirator 2 by relatives of the defendant CELENIA POLANCO, also known as "Kathy," in the Dominican Republic.


6. Subsequent investigation of the cellular telephone belonging to the defendant CELENIA POLANCO, also known as "Kathy," which she had lent to Co-Conspirator 2, revealed numerous calls in February 2011 to two numbers in the Dominican Republic which matched the numbers Co-Conspirator 2 had for the individual who provided the suitcase and cocaine.

7. Further, according to CW1, the defendant CELENIA POLANCO, also known as "Kathy," had previously sent her minor daughter to the Dominican Republic in January 2011 in order to have her unwittingly transport drugs back into the United States. Subsequent record checks confirm that the defendant's minor daughter traveled to the Dominican Republic from January 26-30, 2011, and that her airline ticket was purchased at the same agency at which the defendant purchased the airline ticket for Co-Conspirator 2.

8. Further, the itinerary for the minor daughter of the defendant CELENIA POLANCO, also known as "Kathy," was signed in the defendant's name, "Celenia Polanco." According to CW1, Co-Conspirator 1 picked up the defendant's minor daughter from JFK airport upon her return to the United States knowing that the


girl had served as a drug courier. Parking records confirm Co-Conspirator 1's vehicle was at JFK that day.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant CELENIA POLANCO, also known as "Kathy," so that she may be dealt with according to law.



SEAN GABAY
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
24th day of May, 2012



The Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York